

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

TEXAS DEMOCRATIC PARTY, GILBERTO §  
HINOJOSA, Chair of the Texas Democratic §  
Party, JOSEPH DANIEL CASCINO, §  
SHANDA MARIE SANSING, and §  
BRENDA LI GARCIA §  
*Plaintiff,* §

v. §

GREG ABBOTT, Governor of Texas; RUTH §  
HUGHS, Texas Secretary of State, DANA §  
DEBEAUVOIR, Travis County Clerk, and §  
JACQUELYN F. CALLANEN, Bexar County §  
Elections Administrator §  
*Defendants.* §

CIVIL ACTION NO.  
5: 20-CV-00438-FB

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**PLAINTIFFS' MOTION FOR LEAVE TO EXCEED PAGE LIMITS**

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TO THE HONORABLE JUDGE FRED BIERY:

Plaintiffs, Texas Democratic Party, Gilberto Hinojosa, Chair of the Texas Democratic Party, Joseph Daniel Cascino, Shanda Marie Sansing, and Brenda Li Garcia, respectfully move for leave to file a Motion for Preliminary Injunction in excess of the Western District Local Rules 10-page limit, up to 40 pages. L.R. CV-7(d)(3).

Plaintiffs filed their Second Amended Complaint on April 29, 2020 against Defendants alleging violations several complex constitutional and statutory violations. As can be seen in Plaintiffs' Second Amended Complaint, there are a myriad of legal issues and claims applicable to the Defendants have brought suit against, which requires substantial discussion of decisional

law. The Plaintiffs will not oppose any future motion by the Defendant's to exceed page limits in response to this request.

### **CONCLUSION**

Plaintiffs respectfully request the court grant Plaintiffs leave to file a Motion for Preliminary Injunction not exceeding 40 pages.

**DATED:** April 29, 2020

Respectfully submitted,

TEXAS DEMOCRATIC PARTY

By: /s/ Chad W. Dunn

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

I certify that, on April 29, 2020, I filed the foregoing Plaintiffs' Motion for Leave to Exceed Page Limits was filed *via* the Court's ECF/CM system, which will serve a copy on all counsel of record.

/s/Chad W. Dunn  
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